VICTOR N. PIPPINS
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Attorneys for Mr. Padilla-Bautista

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE JANIS L. SANMARTINO)

UNITED STATES OF AMERICA, Plaintiff, v. **CRECNCIO PADILLA-BAUTISTA** Defendant.	Case No. 08-CR-0205-JLS Date: February 22, 2008 Time: 1:30 p.m. **NOTICE OF MOTION AND MOTIONS TO:** **1) COMPEL DISCOVERY** **2) DISMISS INDICTMENT** **3) SUPPRESS STATEMENTS**

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY
DAVID D. LESHNER, ASSISTANT UNITED STATES ATTORNEY

PLEASE TAKE NOTICE that on February 22, 2008, or as soon thereafter as counsel may be heard, CRECENCIO PADILLA-BAUTISTA, by and through his counsel, Victor N. Pippins and Federal Defenders of San Diego, Inc., will ask this Court to enter and order granting Mr. Padilla-Bautista's motions in the above listed case.

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MOTION

CRECENCIO PADILLA-BAUTISTA, by and through his attorneys, Victor N. Pippins, and Federal Defenders of San Diego, Inc., hereby moves this Court to grant the following motions.

These motions are based upon the instant motion and notice of motion, the attached statements of facts and memorandum of points and authorities, and any and all other materials that may come to this Court's attention at the time of the hearing on this motion.

Respectfully submitted,

Dated: February 8, 2008

/s/ Victor N. Pippins
VICTOR N. PIPPINS
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Padilla-Bautista

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(HONORABLE JANIS L. SANMARTINO)

UNITED STATES OF AMERICA, Plaintiff, v. CRECNCIO PADILLA-BAUTISTA, Defendant.	Case No.: 08CR0205-JLS Date: February 22, 2008 Time: 1:30 p.m. **CERTIFICATE OF SERVICE**

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of his information and belief, and that a copy of the foregoing document has been served this day upon:

David D Leshner
david.leshner@usdoj.gov,esmeralda.diaz@usdoj.gov,efile.dkt.gc1@usdoj.gov

Respectfully submitted,

DATED: February 8, 2008

/s/ Victor N. Pippins
VICTOR N. PIPPINS
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Padilla-Bautista